

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

GRADUAL TAYLOR,

Plaintiff,

vs.

CHERYL HART, et al.,

Defendants.

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: CASE NO.
: C-1-02-446
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VOLUME I

Deposition of: SHEILA TAYLOR
Taken: By the Defendants
Pursuant to Subpoena

Date: February 2, 2007

Time: Commencing at 1:40 p.m.

Place: City Hall
801 Plum Street
Room 214
Cincinnati, Ohio 45202

Before: Kimberly L. Wilson, CSR
Notary Public - State of Ohio

ORIGINAL

1 APPEARANCES:

2 On behalf of the plaintiff:

3 Gradual Taylor, (pro se)
4 8283 Carroll Avenue
5 Cincinnati, Ohio 45231

6 On behalf of the defendants:

7 Richard Ganulin, Esq.
8 of
9 City of Cincinnati Law Department
10 801 Plum Street
11 Room 214
12 Cincinnati, Ohio 45202

13 and

14 Donald E. Hardin, Esq.
15 and
16 Kimberly A. Rutowski, Esq.
17 of
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19 Cincinnati Club Building
20 30 Garfield Place, Suite 915
21 Cincinnati, Ohio 45202

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(No exhibits.)

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SHEILA TAYLOR

of lawful age, a witness herein, being first duly sworn as hereinafter certified, was examined and deposed as follows:

DIRECT EXAMINATION

BY MR. GANULIN:

Q. Please state your name and address.

A. Sheila Taylor, 8283 Carroll Avenue, Cincinnati, Ohio 45231.

Q. Are you the wife of the plaintiff in this case --

A. Yes.

Q. -- Gradual Taylor?

A. Yes.

Q. As I explained off the record, I just want to make sure you're clear that you're providing sworn testimony today subject to the laws of perjury. Do you understand that?

A. Yes.

Q. And if you don't understand a question I'm asking, please ask me to repeat it. I'll try to be as plain and clear as I can be.

A. Okay.

Q. Do you have any -- excuse me. What was your maiden name?

1 A. Dixon, D-i-x-o-n.

2 Q. And have you been known by any other names
3 besides Dixon and Taylor?

4 A. No.

5 Q. How long have you been married to Mr.
6 Taylor?

7 A. About a year and a half.

8 Q. How long have you known him?

9 A. 22, 23 years.

10 Q. So back in the 1980s?

11 A. Yes.

12 Q. Can you explain how you met?

13 A. I met him when he was playing a job
14 somewhere. He was a musician and we started seeing
15 each other.

16 Q. How long did you see each other?

17 A. Since I was 19. How long? I don't --

18 Q. Yeah. You started seeing him when you
19 were 19?

20 A. Correct.

21 Q. And have you been together since that
22 time?

23 A. Pretty much on and off. There was a
24 couple of on-and-off times, but pretty much, yes.

25 Q. Can you tell me about the off times, when

1 did those occur?

2 A. I don't know. We're talking -- we're
3 going back a long time here.

4 Q. Let's start at the beginning when you were
5 19. How long did you stay together starting when you
6 were 19?

7 A. About four years and then our off times
8 were only a few months here and there. It was not
9 anything major. It was -- I was very young, so -- I
10 can't even remember. This is a long time ago.

11 Q. You can just take a minute to just try to
12 remember. I don't need specific details, but more or
13 less do you remember why you broke up the first time?

14 A. Just general disagreements. You know,
15 boyfriend/girlfriend stuff. I mean, I don't remember
16 anything specific. It's been a long time ago. I was
17 very young and I had a lot of family, you know, that
18 thought I should have been with somebody my own age.
19 That was a little bit of it.

20 Q. Okay. And once you got back together at
21 that point after -- how long did you split?

22 A. Not long. A couple of months. Two or
23 three months.

24 Q. And then you got back together. You were
25 more or less about 23 years old at that time, give or

1 take a year or so?

2 A. Well, we had -- our first child was born
3 when I was 23, so we have a daughter that is now 18
4 that we had together when I was 23.

5 Q. And did you have another off time after
6 your daughter was born?

7 A. About six or seven months, yes.

8 Q. For a period of six or seven months --

9 A. Yes.

10 Q. -- or six or seven months after your
11 daughter was born?

12 A. It was a period when I was late pregnancy
13 until she was about six or seven months old. I would
14 say maybe it lasted eight, nine months.

15 Q. And then when your daughter was six or
16 seven months old, you got back together?

17 A. Uh-huh.

18 Q. And how long were you together from that
19 point forward to when you split up again?

20 A. We didn't split up again after that. We
21 have been together ever since.

22 Q. You have other children with Mr. Taylor?

23 A. One, yes.

24 Q. Two children altogether?

25 A. Yes.

1 Q. Did you have a chance to read Mr. Taylor's
2 deposition transcript?

3 A. No.

4 Q. Did he talk to you about the deposition?

5 A. A little bit, yes.

6 Q. Do you know that he identified you as a
7 witness in this case?

8 A. Yes.

9 Q. Do you know why you're identified as a
10 witness?

11 A. Yes.

12 Q. Can you tell me?

13 A. Because the day that it happened, we --

14 Q. Just so we're clear, when you say "the day
15 that it happened," what are you referring to?

16 A. The day that he was arrested, okay,
17 downtown. He called me from jail to come down and
18 get him. That's -- that's what he did. That's how I
19 was a witness. And I had to go down and I had to go
20 to -- and I looked at the complaint that was done at
21 that time because they showed it to me because I was
22 very shocked -- needless to say I was extremely
23 shocked by it and I was waiting for him when he got
24 out that day.

25 Q. And then did you leave him because of that

1 arrest?

2 A. Yes, I did.

3 Q. When did you leave him? I thought before
4 you said you didn't have any other off times.

5 A. I thought you were talking about prior to
6 this incident. I'm sorry, I didn't understand. I
7 thought you were talking about prior to this
8 incident --

9 Q. Okay.

10 A. -- because we're talking about a
11 20-some-year span relationship that we've had. But
12 prior to the relationship that -- prior to the
13 incident of that date, the ones I told you about were
14 the only times we really split up and it wasn't for
15 very long. We did split up over that because I was
16 extremely upset over the complaint.

17 Q. Did you leave him that day?

18 A. Within the next day or two. I can't
19 remember if it was that night or the next night. It
20 was within the next couple of days.

21 Q. And the two children went with you?

22 A. Yes.

23 Q. Where did you go?

24 A. I stayed with a friend of mine that lived
25 in the neighborhood of Deer Park and then I went and

1 stayed with my sister for a little while.

2 Q. And how long did you stay apart?

3 A. I'm trying to remember exactly. It was a
4 few weeks, maybe. I'm not exactly -- I can't exactly
5 remember how many days. He was telling me that it
6 wasn't true and one of the reasons that made me
7 believe him is he had never done anything like that
8 ever. In fact, just the notion of hiring a
9 prostitute, you know, to me was unbelievable. It was
10 a shock to me, but a police officer stated it, so you
11 know, it's hard for me to believe that somebody --
12 you know, that a police officer would not be telling
13 the truth at the time.

14 And so we talked about it and I looked at
15 the complaint, actually was able to see it online,
16 but when I got angry, I do really -- I did at the
17 time. I was a lot younger then. I did a lot of
18 stupid things and I ended up just basically -- I feel
19 like the business was mostly created by me because
20 I'm the person that sells.

21 Q. Which business? Why don't you describe
22 that? And we'll talk about that some more, but --

23 A. Okay. We had a business. It's called All
24 American Marketing and basically I sell ads on vinyl
25 phone book covers and had done that at other

1 businesses in Cincinnati. I became very good at it
2 right around the time that my daughter -- I was
3 pregnant with my daughter. I became successful at
4 something.

5 Q. First or second daughter?

6 A. I only have one daughter.

7 Q. I'm sorry. Then the -- she's 22?

8 A. She's 18.

9 Q. Okay.

10 A. She's 18. We also have a 12-year-old son
11 named David. But when I was pregnant with my
12 daughter, I actually waited tables and then I found a
13 job selling. And I didn't know that I was good at
14 it, but I became very good at it and I worked at a
15 few different companies in the city. And basically
16 this business is built around a salesperson. A
17 salesperson sells ads to business owners across the
18 country via telephone and then you -- it's on a vinyl
19 phone book cover that goes over major phone books
20 across the country. So it's a business that can be
21 done anywhere. It can be done in California,
22 Timbuktu, from your bedroom. I mean, it's just the
23 way that it works.

24 So because I felt like -- and I brought my
25 husband into -- then boyfriend at the time into the

1 business when I was working at a company called
2 Telecorp. And my husband was a musician and he
3 basically played music on Friday and Saturday nights
4 and did this for the entire time from the time I met
5 him until just a few years ago. And sometimes I felt
6 that my husband needed something in case when he
7 became older that you couldn't always just be a
8 musician. There's a 15-year age difference between
9 us and I think along the security and the future
10 lines and he was a musician and the creative type. I
11 have no creativity whatsoever about myself.

12 So I brought him in the business and he
13 started selling and he was terrible at it, absolutely
14 terrible. But, you know, our business, not only is
15 there a seller, there's a person who goes out to the
16 businesses and presents the items that are ordered
17 from the client and they pick up payment and we call
18 them field reps. So I knew instantly that because my
19 husband had been a musician and he's dealt with
20 people for 30, 40 years, you know, that he would be
21 very good at going into offices and, you know,
22 presenting the product and he became a delivery
23 person or field rep, so to speak.

24 So when we had our own business, I did the
25 selling. I did the proofing of the ads and typed and

1 did all that kind of stuff and he basically took the
2 product and did the collections. That's how it
3 works.

4 MR. GANULIN: Do you want us to wait,
5 Gradual? We can go off the record for a
6 second.

7 (Off the record.)

8 MR. GANULIN: Let's go back on.

9 BY MR. GANULIN:

10 Q. And if you would, continue explaining the
11 nature of the business, please.

12 A. Okay. I don't know what else there is.
13 You sell ads on vinyl phone book covers to businesses
14 across the country. You produce the product here and
15 then you take it to wherever you're selling it from.

16 Q. Let me bring you back to the question we
17 were on before I asked you to explain the nature of
18 the business and that is, you testified, I think, you
19 moved back into the house several weeks after you
20 left --

21 A. Yes.

22 Q. -- is that correct? And I asked you why
23 you moved back at that point and you started talking
24 about the business.

25 A. Okay. I moved back because at that point

1 I had known him, oh my God, 15 years, maybe. I don't
2 know if that's exactly right. I had known him since
3 '84 to 2000. That's 16 years, I guess. And in that
4 time, being that he was a musician, I knew that my
5 husband would never have had to -- or boyfriend at
6 the time would never have had to pay a girl. I mean,
7 there was always girls in the bars, always, that
8 will -- you know -- I mean, there was always girls
9 that liked musicians that, you know, thought they
10 were great no matter what they did and for me I just
11 believed him. I believed that he was telling the
12 truth. And it took me awhile because I was raised to
13 believe that when the cop -- when the police officer
14 says something, that it is fact.

15 I've not had a lot of dealings with police
16 in my life and neither has my husband, but personally
17 I myself have had very little dealings with police
18 officers, but I always thought that there was -- when
19 I read it originally, it was more shock. It was more
20 surprise and it was -- I was embarrassed. I was
21 extremely embarrassed. I had a house full of people
22 at the time, relatives of my husband -- his mother
23 was on her deathbed, literally, and the doctors were
24 calling all the time. I had to drive his aged aunt,
25 who was in her 80s, to the hospital to see her

1 sister. It was her sister. My husband and I were
2 trying to continue to earn a living because I had to
3 sell ads and he needed to go -- he was, at the time,
4 going to El Paso, Texas, I believe it was, with two
5 sets. Usually he goes for one at a time, but we had
6 done two because it was so far away we wanted to make
7 it economical to do two at one time -- two covers for
8 the area and do it at one time instead of making two
9 separate trips.

10 So, yeah, I moved back into the house
11 after I believed -- and plus, all this was going on
12 with his mother. You know, his mother was dying.
13 They needed me and I didn't want his family members
14 or mine to find out about that charge.

15 Q. And you have not moved out since, you
16 testified?

17 A. Since I went back?

18 Q. Right.

19 A. No.

20 Q. You keep the books for the business; is
21 that correct?

22 A. Pretty much, yes. I mean, mostly the
23 reason that I worked from home was because when our
24 daughter went to school, she did not like school and
25 she had been in day care the entire time. So when I

1 got pregnant with my son -- let me back up.

2 When my daughter started school, it was a
3 problem from the time she went to kindergarten. I
4 mean, just -- she hated school and -- and I had her
5 in day care and I wanted to be able to be at home,
6 first off, for her, when she got home from school,
7 but then I became pregnant with my son. He was born
8 in '94 and I wanted to be able to be home with him.
9 I did not want to send him to day care like I had
10 Crystal.

11 Q. When you were subpoenaed to attend, the
12 subpoena asked you to bring the financial records for
13 the business. Did you bring those?

14 A. No. That was seven years ago and I don't
15 have them anymore. It's been a long time ago. This
16 has been -- I know at the time basically we were
17 covering the business -- everything we made basically
18 went back. We had to buy a copier. We had to buy
19 computers. We had to buy software for the art person
20 to do the layout of the covers. Sometimes it seemed
21 like it wasn't worth it to me because we were always
22 paying out, but in the end it was worth it because I
23 got to be home with my baby, so that's pretty much
24 why I did it.

25 Q. Really, I think you were requested to

1 bring in the financial records for the business from
2 whatever years you had before and after, but --

3 A. I thought it was up until then.

4 Q. It wasn't -- it wasn't just up until that
5 time. It was since that time, too.

6 A. Well, I misunderstood what I was asked for
7 and I don't have that. I mean --

8 Q. Just so we're clear, you haven't brought
9 any tax returns or any --

10 A. No.

11 Q. -- income statements or balance sheets
12 or --

13 A. No.

14 Q. -- anything at all?

15 A. No, because I thought that's what you
16 wanted for that year. I did not know.

17 Q. Are there any other businesses for which
18 you keep the books?

19 A. No.

20 Q. Does Mr. Taylor have a musical business, a
21 band business that you keep the books for?

22 A. No.

23 Q. The best you can remember, do you and Mr.
24 Taylor report income jointly? Do you file joint
25 federal income tax returns?

1 A. We did it under All American Marketing.
2 We were self-employed and a lot of our -- a lot of it
3 was written off because so much went in -- when it's
4 only one salesperson, it's not like having a roomful
5 of telemarketers. You've got one. So basically I
6 would do a cover once every couple of weeks -- once
7 every two weeks. A couple of covers a month
8 basically is what I did. And when you sell those
9 ads, on each cover there's between 15 to 25 ads, so
10 it takes awhile to sell that many ads. Plus, in
11 addition, not only selling it, you've got to lay it
12 out, you've got to proof it and all those kind of
13 things to go along with doing the job.

14 Q. But my question is whether you and Mr.
15 Taylor filed joint income tax returns.

16 A. Yes, I believe we did.

17 Q. I mean, last -- for -- have you filed yet
18 for 2006?

19 A. No.

20 Q. Did you file in 2005?

21 A. Yes.

22 Q. Did you file a joint income tax return?

23 A. Yes.

24 Q. And you have those? I know you didn't
25 bring them today, but they're available?

1 A. I'm sure I do.

2 Q. Would you have your returns for 2004?

3 A. Yes.

4 Q. How far back do you think you have them?

5 A. I know -- I know I have 4s and 5s readily
6 available is what I'm saying. 4s and 5s would be the
7 ones I would have readily available.

8 Q. But prior years, you don't think you have
9 access to those?

10 A. Well, we had a move and stuff. I mean, we
11 bought a home in '04. We had a move. I'm sure I
12 could come up with at least three years' worth.

13 Q. Is your business a corporation?

14 A. No.

15 Q. A sole proprietorship?

16 A. Yes, but I want to intercede that in '04 I
17 went and worked -- I worked at a company. I decided
18 to go work for a company, so I -- '04 and '03 I
19 worked for a company.

20 Q. So you got a W2 form from them?

21 A. 1099, yes.

22 Q. When did you form the business -- I'm
23 sorry, what was the name again? American --

24 A. All American Marketing.

25 Q. All American. When did you form that?

1 A. Back in '93.

2 Q. And did Mr. Taylor begin to work then?

3 A. Yes.

4 Q. And he's continued to work with All
5 American since then?

6 A. As long as I was selling for the -- that
7 business. Sometimes I will go and work for another
8 business, if the offer is good enough. There's a lot
9 of companies that do what we do and some of them will
10 offer -- will want me to go work for them for a while
11 and make money for them.

12 Q. And did the business pay Mr. Taylor a
13 salary each week or was it a commission or how did it
14 compensate Mr. Taylor?

15 A. Well, are we talking about back in 2000?

16 Q. Starting at the beginning in '93.

17 A. We basically -- other than what we put
18 into the business, we lived on basically. I mean,
19 other than what went into the business as far as
20 printing, paying someone to do artwork, paying to
21 have the cover shipped to wherever they needed to be,
22 we basically, after that, if it -- if we weren't
23 buying something or repairing something or software
24 or something, we basically lived off of whatever
25 else, which --

1 Q. So the business did not file a separate
2 tax return, is that what you're saying? You two
3 filed a joint return as individuals?

4 A. And being a -- being under the name of All
5 American Marketing. It was like All American
6 Marketing and then it asked for the owner's name and
7 this and that.

8 Q. Do you remember what the revenues of the
9 business were going back to when you began it,
10 roughly?

11 A. I would say between -- it would be under
12 28,000.

13 Q. The revenues?

14 A. Are you meaning before or after?

15 Q. Well, let's start in '93 or '94, as far
16 back as you can remember.

17 A. Sometimes we did more covers than other
18 years. It's according to how much I was wanting to
19 work at the time, so to speak. I mean, like when I
20 had the baby, you know, I didn't work as much, you
21 know. When -- other times I would work more than
22 other times. So as a yearly gross, I would say they
23 varied between, you know, 20,000, 22 up to 28, okay.
24 I mean we didn't really get rich off the business,
25 but we -- I was able to stay at home.

1 Q. Again, you're referring back to the '90s
2 now?

3 A. Yes, I am.

4 Q. But the business did not depend on Mr.
5 Taylor for the revenue, I think you said. You took
6 care of the sales, if I recall your testimony, and he
7 did the deliveries?

8 A. Correct. That is correct. Without sales,
9 there is no business in our business.

10 Q. And you were the salesperson?

11 A. I am, yes.

12 Q. You are. At some point did the revenues
13 change over time? Did they go --

14 A. Up or down, is that what you're asking?

15 Q. Yes.

16 A. They would go up and down --

17 Q. Like, as we move to the latter part of the
18 '90s, what were the revenues?

19 A. I'm trying to remember and I'm trying to
20 make sure that this is right. And as far as my
21 estimation will go, some years they would be 18-,
22 19,000; sometimes they would be 22. They were always
23 between 18 and 28. Now, 28 being when I was really
24 working and 18 being when I really wasn't.

25 Q. I think you said it varied depending on

1 the effort you made, the time you spent with your
2 kids and other things going on --

3 A. Well, yes.

4 Q. -- in your life?

5 A. Sales -- in any sales job -- people buy
6 the ad, especially over the telephone -- they can't
7 see your face. They can't, you know, see your
8 mannerisms. They can only hear your voice. If you
9 are not up all the time -- I mean, I'm talking to
10 business owners. If I'm not excited about the
11 product, he's not excited about the product. So a
12 lot of it depends on your mood for the day. You
13 know, they always say leave your troubles at the door
14 and that's how it works. And if you're not in a
15 great emotional frame of mind, you might not do so
16 well.

17 Q. And has that range of 18- to 28,000
18 continued through to this year -- last year?

19 A. I did really well when I worked in an
20 office because all I had to do was sale, but when I
21 worked from home, I had a lot more responsibilities.
22 When I go to work in an office, all they want me to
23 do is sell ads. When I worked from home, there's,
24 again, proofing and all the other things that go
25 along -- there's administrative work. You know,

1 there's invoices to type. There's a lot more work at
2 home than there is when I go to work for somebody
3 else.

4 Q. So have the revenues changed over time?
5 In other words, let's talk about the 2000s. Have the
6 revenues for All American been --

7 A. Pretty much the same.

8 Q. -- 18 to 28?

9 A. Uh-huh.

10 Q. Again, still depending on your own
11 personal effort?

12 A. Yes, it's all personal effort, sir.

13 Q. Now, when you said for -- I think it was
14 2003 and 2004 you worked for another firm?

15 A. Yes, I did.

16 Q. That was separate and apart from All
17 American as I understand what --

18 A. That is correct.

19 Q. Did you continue to work for All American
20 during that same time?

21 A. No, but what I did do, when I did not work
22 from home in the years -- because I -- I'm trying to
23 remember all the years that I worked outside the
24 house. I worked outside of the house -- in fact, I
25 work at home now, although I'm working for somebody

1 else. They just let me work from home. All I have
2 to do is sell ads. But I worked out of the house in
3 '03, '04, '02 and parts of 2000, parts of '01,
4 because I can flip back and forth. I mean, I can
5 work from home, if I want, for my company, or I can
6 go to work for them or sometimes I simultaneously
7 work for both.

8 Q. And is that what you're doing now?

9 A. Simultaneously working for both?

10 Q. Now.

11 A. I have been for the last while, yes.

12 Q. How about Mr. Taylor, at the times when
13 you're not selling for All American so that he can
14 handle his responsibilities, then what work is he
15 doing during those --

16 A. We pretty much abandon the business and
17 then he'll go to work for doing deliveries, same
18 thing, for somebody else is what he'll do. And
19 they'll pay him commission on the deliveries that he
20 picks up.

21 Q. But you have a set of books, I presume,
22 for All American that goes back quite a few years?

23 A. I file taxes every year under it. If
24 there were a lot of write-offs, I would go to an
25 accountant or H&R Block. Sometimes I did it myself,

1 depending on how complicated I thought it was going
2 to be. But taxes were filed every single year for
3 All American Marketing that I worked for All American
4 Marketing.

5 Q. Right. Besides the tax returns -- I'm not
6 asking about the tax returns right now -- do you have
7 any other books to reflect the financial status of
8 All American?

9 A. Well, there is no financial status of All
10 American Marketing when I'm not working in it. If
11 I'm off -- if I'm not working for years and I'm
12 working for another company, there's no business
13 without me selling any --

14 Q. Right. But for the years you are working,
15 are there other financial records that you keep?

16 A. Not anymore. It's been a very long time
17 since I totally committed myself to that business.
18 It's been a long time.

19 Q. But All American is still active now, I
20 thought you said?

21 A. From time to time I will do a cover, only
22 one, here or there under the name because I've been
23 forced -- since the time that I totally abandoned the
24 business as far as it was what I did every day, it
25 was what we -- I didn't work for nobody else, since

1 the time that I abandoned it and went to work for
2 other people, I pretty much -- because by the time
3 that that happened, it was the year 2000. My son was
4 six and he was going to school that year and I had
5 spent the years being able to be at home with him.
6 And when I work at another company, I can still
7 sometimes work from home, if I want to, or I can work
8 in the office. So I've pretty much been working for
9 other companies off and on as long as I want to.

10 Q. And Mr. Taylor has been doing the same
11 thing then, working for other companies?

12 A. Yes.

13 Q. You hesitated a little bit.

14 A. Well, I hesitated because there was just
15 one time when he didn't have a car for a long time,
16 but other than that, yes. That's why I hesitated.
17 His car (sic) depends on him having a dependable
18 vehicle and things like that and there was one point
19 where --

20 Q. You said his car, but you meant his work
21 depends on him having a vehicle?

22 A. Correct, yes. And there was one time when
23 he just didn't have a dependable -- dependable
24 vehicle to go across the country in and he didn't
25 work for a little while.

1 Q. What time frame was that?

2 A. It was -- I want to say '05 --
3 September of '05 until about September of '06. It
4 was about -- he was off for about a year. He did a
5 couple of jobs using our other car, but we really
6 didn't want to put the miles on that car. We wanted
7 him to have a cheap, inexpensive vehicle that was
8 dependable that could rack up the miles as opposed to
9 putting it on our other car.

10 Q. Did I hear you say that in 2000, the same
11 year as the arrest, your son started school that
12 year?

13 A. Well, he would have been -- my son's
14 birthday was in October, so he would have started in
15 October following -- he was still at home at that
16 point. In time that winter, he would have been home,
17 but he went to school later. He actually went to
18 school when he was six because of his birthday.

19 Q. Is there any other income that you take
20 care of for Mr. Taylor besides what you've described
21 so far?

22 A. That I take care of?

23 Q. Take care of or are aware of for Mr.
24 Taylor?

25 A. Other than our business? Well, he did do

1 music. I mean, he did play in the band. I mean, he
2 made money doing that.

3 Q. And did you take care of that money? Did
4 he give it to you?

5 A. Did he give it to me?

6 MR. TAYLOR: Oh, boy, she's in trouble
7 with that one.

8 A. I don't understand the question. I don't
9 understand what you're asking me. Are you saying did
10 he come home and give me his money? I don't know.

11 MR. TAYLOR: That's pretty much what
12 happened.

13 BY MR. GANULIN:

14 Q. Did you keep any books for Mr. Taylor's
15 music business?

16 A. Did I keep the books for it? Well, yeah,
17 we included it in income that we made. Any income
18 that we made from him playing music was, of course.
19 But, again, he was self-employed as a musician.

20 Q. Do you remember approximately what the
21 revenues were for him annually starting as far back
22 as you can remember?

23 A. No, I don't. I don't. I mean, I really
24 don't know. It's been a long time ago. I don't
25 know.

1 Q. On an annual basis, do you have any idea,
2 roughly, how much money he would add to the family
3 income as a musician, more or less?

4 A. I'm trying to think in my head how that
5 went.

6 Q. Like \$1,000 a year? \$2,000 a year? Any
7 idea?

8 A. He brought in another, I would say, 5- or
9 6,000 doing that. I'm just guessing here, by the
10 way. That is not concrete and I'm not totally sure.

11 Q. That would be going how far back?

12 A. Well, he played music from the day I met
13 him until -- I don't know. It was -- I even can't
14 exactly remember when he stopped. It's been -- this
15 is a long time ago. It's hard to remember exactly to
16 the moment. I'm not sure.

17 Q. I don't need to know exactly to the
18 moment, but did he stop back in the '90s as he
19 started to work for All American?

20 A. He always played music up until around
21 2001, I want to say, because what he would do is we
22 would schedule it so that he would be in -- say he
23 had to be in El Paso. He would be in El Paso on
24 Sunday night and we would make sure that he was back
25 by Friday night so he could play, because when he

1 played music it was always a Friday and Saturday
2 night so we always made sure he would be back when he
3 had gigs to play.

4 Q. He stopped playing more or less in 2001,
5 you think?

6 A. I want to say between the end of 2000, mid
7 2000, to the end of 2001. I'm not exactly sure of
8 that, to be truthful. The musician thing was never
9 my thing, so --

10 Q. Do you know why he stopped playing?

11 A. I really don't know why. I've asked him a
12 couple of times. I really didn't care for the bars
13 and so for me I was happy, but, I mean, for him,
14 that's what he loved to do, you know. I mean, that's
15 what he loved to do from the time that I knew him. I
16 met him playing music. So even when he was not
17 playing music, he was doing stuff at home with his
18 recorders and whatnot. He has all kinds of stuff.

19 Q. You didn't care that he stopped earning
20 that additional income?

21 A. Did I care? No.

22 Q. What did he tell you when you asked him
23 why he stopped playing?

24 A. I really didn't ask him to stop because,
25 frankly, I was kind of -- I don't know. In a way it

1 just didn't matter to me whether he made it or not.
2 It wasn't like it was going to -- you know, I always
3 knew that I had earning potential and from the time I
4 was -- since the time I was 23, I've always been able
5 to make money. So to me, him playing music, that was
6 his thing, that was his love, that was his joy, not
7 mine. So when he made money at it, great, I'm happy
8 for it, but if he didn't, it didn't matter to me
9 either.

10 Q. Does he still play music at home?

11 A. At home? Sometimes, not often. More a
12 little bit lately because our 12-year-old son is
13 interested in it.

14 Q. He just doesn't go work in bars anymore;
15 is that what you're saying?

16 A. No.

17 Q. After he was arrested and you went to bail
18 him out, do you remember what he told you?

19 A. Oh, I remember that day. After I was
20 sitting waiting for it seemed to me a long time and
21 he came out of the Justice Center and we were walking
22 down the street and I remember it was very cold and
23 my husband -- the car was God knows where. We were
24 walking to wherever the car was. And we were walking
25 down the street and I said to him I cannot believe

1 you did this, because I had read the complaint when I
2 had went up to find out when he was getting out and
3 if I had to pay money or whatever. I don't remember.
4 But the guy had showed it to me because I was like,
5 wait, let me see that. He was like the 50-year-old
6 guy that got arrested for prostitution or
7 prostitute -- something to that effect.

8 So I asked to see the complaint because I
9 was so shocked and he showed it to me and I read it.
10 And when he came out of the Justice Center and we
11 were walking -- I remember it was extremely cold --
12 and he was ahead of me -- he walks very fast. I can
13 barely keep up with him. I was like I can't believe
14 you would do this. I was pretty angry. I was
15 yelling at him. And he goes what are you talking
16 about. And I said -- I think the exact wording was
17 loitering for the solicitation -- for solicitation or
18 something to that effect. I don't know exactly that
19 that was the exact terminology that was on that
20 complaint, but everyone -- but I knew what that meant
21 and I had read the complaint. He goes, no, no, I got
22 arrested for -- he thought he got arrested for
23 loitering. So he drags me back into the Justice -- I
24 mean, when I say "drag," I don't mean drag.

25 Q. I understand.

1 A. I don't mean he took my by the hair of the
2 head. He said I got arrested for loitering. I said,
3 no, that is not what the complaint said. I read it.
4 He goes, no, no, you're wrong, you're wrong. So we
5 go back about a block and a half. By this time we're
6 about two blocks away from the Justice Center and I'm
7 cold and I'm mad.

8 Q. Let me just ask you to talk a little
9 slower because she's probably --

10 A. I'm sorry. When I got to this, I get mad.
11 I'm sorry. So we go back to the Justice Center and
12 he reads it. And then that night I was able to go
13 online and read it online again, you know. But he
14 was shocked that it said that and that's one of the
15 reasons that later, after I calmed down -- I hope I'm
16 going slow enough -- after I calmed down later --
17 weeks later or however long it was that made me
18 believe him because his initial reaction was not of a
19 man that was trying to lie to me. He was -- he was
20 as surprised as I was because he made us go all the
21 way back to read it at the court -- or the Justice
22 Center.

23 Q. And besides his denying it, anything else
24 that you can remember him telling you?

25 A. Well, I'll be honest with you. Again, we

1 had his sister staying with us, her teen-age son,
2 another sister was there. Two sisters total. Both
3 of his sisters were there, her son. Various
4 relatives because his mother was dying and I could
5 not believe that between needing to go to El Paso so
6 that we could, you know, live and needing to take
7 care of his dying mother -- because he was the one
8 that they called -- the doctors called. He was the
9 one who was, I guess, her guardian, you could say --
10 that he would stop to make a pit stop to get a
11 prostitute. I mean, that just didn't -- after I
12 calmed down, it did not make a whole lot of sense.
13 He was very upset about his mother. They were
14 wanting him to take her off life support. Neither
15 one of us had ever been in that position before. We
16 didn't know what the right thing to do was. He
17 didn't. It was up to him. And after I calmed down
18 somewhat -- and I'm a very excitable person -- it
19 just didn't seem to make sense to me. And I did
20 believe him because I did remember his reaction when
21 I told him on the street -- when I was yelling at him
22 about the complaint, what it said.

23 Q. Do you know if Mr. Taylor has ever filed
24 any other lawsuits in the past?

25 A. Do I know of any? No, I don't, not that I